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FILE

BEFORE THE

**Federal Communications Commission**

WASHINGTON, D. C. 20554

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OCT 23 1992

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )

Amendment of Section 73.202(b), )  
Table of Allotments, )  
FM Broadcast Stations )  
(Arvin, California) )

MM Docket No.

RM-

To: The Commission

PETITION FOR RULE MAKING

Farmworkers Communications, Inc. ("Farmworkers"), by its attorney, hereby petitions the Commission to issue a Notice of Proposed Rule Making to allot FM Channel 223A at Arvin, California. In support whereof, the following is shown:

Farmworkers is the licensee of noncommercial educational station KUFW(FM), Woodlake, California. As demonstrated in the attached Engineering Exhibit, Channel 223A can be assigned to Arvin as proposed, in full compliance with all applicable distance separations and coverage requirements, from the specified special reference point.

The allocation proposed herein will afford a first local aural service to the 9,286 persons residing in Arvin, as well as provide a new service to the 270,000 persons residing within the 1.0 mV/m contour, assuming construction of maximum facilities. Arvin is a well-established community, long identified by the U.S. Census as an Incorporated Place, the present population of which represents a thirty-five percent increase over its reported 1980 population of 6,863. The public interest would be served by the allotment of Channel 223A to Arvin.

0 + 4

Should the Commission allot Channel 223A to Arvin, California, Farmworkers will file an application for a permit to construct a new FM station on that channel and will, if its application is granted, promptly construct and operate the station. Accordingly, it is respectfully requested that the Commission amend the FM Table of Allotments as follows:

<u>Community</u>	<u>Channels</u>	
	<u>Present</u>	<u>Proposed</u>
Arvin, California	--	223A

Respectfully submitted,

FARMWORKERS COMMUNICATIONS, INC.

By: Anne Thomas Paxson  
Anne Thomas Paxson

Its Attorney

Borsari & Paxson  
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Suite 630  
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(202) 296-4800

October 23, 1992

JOHN J. MULLANEY  
JOHN H. MULLANEY, P.E.

**MULLANEY ENGINEERING, INC.**

9049 SHADY GROVE COURT  
GAITHERSBURG, MD 20877

301 921-0115

**ENGINEERING EXHIBIT RM:**

**FARMWORKERS COMMUNICATIONS, INC.  
ARVIN, CALIFORNIA  
ALLOTMENT OF FM CHANNEL 223A**

**OCTOBER 16, 1992**

**ENGINEERING STATEMENT IN SUPPORT OF A  
PETITION FOR RULE MAKING  
TO AMEND  
THE FM TABLE OF ASSIGNMENTS**

**ORIGINAL  
SIGNATURE**

**MULLANEY ENGINEERING, INC.**

**ENGINEERING EXHIBIT RM:**

**FARMWORKERS COMMUNICATIONS, INC.  
ARVIN, CALIFORNIA  
ALLOTMENT OF FM CHANNEL 223A**

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1. Declaration of Engineer
2. Narrative Statement.
3. Figure 1, Channel Allocation Study for Ch. 223A.  
from the Requested Reference Coordinates.
4. Figure 2, Allowable Area Map for Ch. 223A.

**MULLANEY ENGINEERING, INC.**

**DECLARATION**

I, John J. Mullaney, declare and state that I am a graduate electrical engineer with a B.E.E. and my qualifications are known to the Federal Communications Commission, and that I am an engineer in the firm of Mullaney Engineering, Inc., and that firm has been retained by Farmworkers Communications, Inc., to prepare an engineering statement in support of a Petition to Amend the FM Table of Assignments.

All facts contained herein are true of my own knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.

  
John J. Mullaney

Executed on the 16th day of October 1992.

**MULLANEY ENGINEERING, INC.**

**ENGINEERING EXHIBIT RM:**

**FARMWORKERS COMMUNICATIONS, INC.  
ARVIN, CALIFORNIA  
ALLOTMENT OF FM CHANNEL 223A**

**NARRATIVE STATEMENT:**

**I. GENERAL:**

This engineering statement has been prepared on behalf of Farmworkers Communications, Inc. The purpose of this statement is to support a request that the FM Table of Assignments be amended to allot Ch. 223A to Arvin, California.

Channel 223A will be the First Local Service to be licensed to Arvin located in Kern County California.

It should be noted that the area in question is not within 320 kilometers (199 miles) of a U.S. Border and, therefore, foreign concurrence is not required.

**II. ENGINEERING DISCUSSION:**

**A. Proposed Site:**

The following geographic coordinates are for a site which is 11.8 kilometers (7.3 miles) east of Arvin, California:

Latitude:        35° 13' 52"  
Longitude:       118° 42' 25"

The proposed site will provide an unobstructed view of the City of License, Arvin, California and is located close enough to serve the entire Community with the required 3.16 mV/M contour.

**B. Channel Allocation Study:**

Figure 1 is a Channel Allocation Study from the Special Reference Point proposed herein which indicates the required separation in kilometers to all known Licenses, Construction Permits, Open Allocations, pending Applications, and pending Rule Makings. From this study it can be determined that the proposed special reference point exceeds all of the minimum separations. It should be noted that the two minor short spacings are within the 0.5 KM tolerance provided for in the rules.

Figure 2 is a map which illustrates these restrictions and the resulting area in which the tower site must be located. This map also indicates that the entire city of Arvin is within 16 kilometers of the proposed site. It should be understood that a Class A operating at 6 KW and 100 meters has a city grade 70 dBu contour that extends 16 kilometers. The terrain in the direction of Arvin is down hill and, therefore, an applicant can easily achieve 100 meters over the city.

**C. Public Interest Showing:**

The allotment of Ch. 223A to Arvin will result in a first local service to Arvin which has a 1990 population of 9,286 persons.

Assuming maximum facilities, the 1.0 mV/m contour has the potential of encompassing 270,000 persons.

Farmworkers believes that the requested channel allotment is in the Public Interest and should therefore be granted by the Commission.

III. SUMMARY:

Farmworkers Communications, Inc., requests that the FM Table of Assignments be amended to allot FM Channel 223A to Arvin, California.

City	Present	Proposed
Arvin, California	-	223A

Farmworkers believes that the proposed allotment of a first local service to Arvin, California, will Serve the Public Interest.

If allotted, Farmworkers will promptly file an application for construction permit.

October 16, 1992.

  
John J. Mullaney

\*\*\*\*\* FM CHANNEL STUDY NO. 1 - MULLANEY ENGINEERING, INC. GAITHERSBURG, MARYLAND - 6-OCT-92 14:30:18 \*\*\*\*\*  
 \*\*\*\*\*  
 LAST UPDATE: 920914 \*\*\*\*\*

NEW 223 A FM POLARIZATION ERP (KW) HAAT RCMNL  
 ARVIN CA US HOR PLN BM TILT (METER) (METER)  
 35.1352 118.4225 (D.MHSS) HORIZONTAL 6.000 0.000 100.0  
 VERTICAL 6.000 0.000 100.0

THE FOLLOWING CONTOURS ARE CALCULATED USING:  
 ERP= 6.000 (KW) 7.8 (DBK) HAAT= 100.0 (METERS)

CALCULATED HAAT FROM TOPD DATA BASE

INTERFERING DOMESTIC  
 DBU KM  
 CO CHANNEL ( 40.0) 86.7  
 1ST ADJACENT ( 54.0) 43.7  
 2ND ADJACENT ( 80.0) 9.1  
 3RD ADJACENT (100.0) 2.8  
 PROTECTED ( 60.0) 28.3  
 CITY GRADE ( 70.0) 16.2

AZIMUTH DEGREES	HAAT (METERS)	HAAT (FEET)	CONTOURS (KM)	
			70 DBU	60 DBU
0.0	238.6	782.7	24.9	41.6
45.0	154.8	507.9	20.4	34.6
90.0	-286.7	-940.7	8.9	15.8
135.0	-632.1	-2073.9	8.9	15.8
180.0	-288.0	-944.7	8.9	15.8
225.0	520.7	1708.3	36.9	58.4
CITY 270.0	582.2	1910.2	39.3	61.6
315.0	510.5	1674.9	36.4	57.7
AVERAGE	100.0	328.1	16.2	28.3

EST SITE ELEVATION : 426.0 m.; 1397.8 ft.  
 EST RAD CENTER AGL : 309.4 m.; 1015.2 ft.  
 RAD CENTER A.M.S.L.: 735.5 m.; 2413.0 ft.

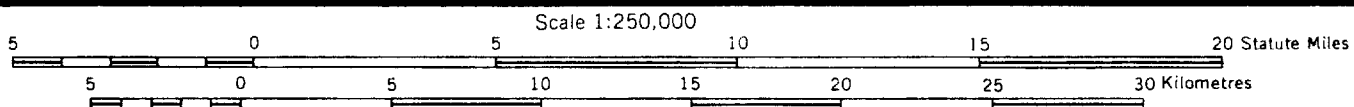
\*\*\*\*\*  
 \*\*\*THE MEXICAN ISLAND OF Los Coronados IS 334.5 KM ON A BEARING OF 156.8 DEG. TRUE\*\*\*  
 \*\*\*\*\*  
 \*\*\*THE MEXICAN BORDER IS 332.8 KM ON A BEARING OF 153.5 DEG. TRUE\*\*\*  
 \*\*\*\*\*

AZIMUTH		LAT		LONG		ERP (KW)		HAAT D I-CON P-CON		IR		IC		REZLT		
FROM	TO	CALL	STS	FILE NUMBER	CITY	ST C	(D.MHSS)	REL CHN	HORZ	VERT	(M)	A F5010	F5050	DIST RSEP	RSEP IR IC	
									(KM)	(KM)	(KM)	(KM)	(KM)	(KM)		
299.7	119.5	KIWI	LIC	BMLH900420KF	Bakersfie CA	A	35.2208	119.0014	2ND	221A	6.0H	6.0V	50	31.0	31.0	C
**DOCKET**84-612 **																
152.1	332.5	KKBT	LIC	BMLHB10908AL	Los Ansel CA	A	34.1336	118.0357	1ST	222B	43.8	43.8	887	126.0	113.0	
**COMMENT**GRANDFATHERED AT 43KM @ 887M HAAT																
275.2	94.1	KDDB	LIC	BLHB90824KB	Paso Robl CA	A	35.2137	120.3917	CO	223B	4.4H	4.4V	468	177.7	178.0	5
15.9	196.2	VAC			Independe CA	A	36.4856	118.0836	CO	223B	H	V		183.0	178.0	C
**COMMENT**Site restricted-Effective 4-20-92-Reserved for KDAY per D91-28																
73.0	253.6	KZIQFM	LIC	BLH900403KB	Ridsecres CA	A	35.2839	117.4158	1ST	224B1	1.50H	1.50V	395	95.6	96.0	5
65.7	246.4	USE			Ridsecres CA	A	35.3658	117.3835	1ST	224B1	H	V		105.6	96.0	
**COMMENT**Effective 6-5-89																
150.7	330.7	KTP1-1	LIC	BLFTB851223TA	Bear Vall CA	A	35.1200	118.4108	IF	276D	.180H	.180V	OD	4.0	10.0	D

s - WITHIN 0.5 KM TOLERANCE

CHANNEL ALLOCATION STUDY  
 FARMWORKERS COMMUNICATIONS, INC.  
 ALLOTMENT OF CHANNEL 223A AT ARVIN, CA

MULLANEY ENGINEERING, INC.  
 GAITHERSBURG, MARYLAND  
 FIGURE 1  
 OCTOBER 1992



**ALLOWABLE SITE AREA - CH. 223A**  
**FARMWORKERS COMMUNICATIONS, INC.**  
**ALLOTMENT OF CHANNEL 223A AT ARVIN, CA**

**MULLANEY ENGINEERING, INC.**  
**GAITHERSBURG, MARYLAND**

**FIGURE 2**  
**OCTOBER 1992**

